

1 Rene L. Valladares  
2 Federal Public Defender  
3 Nevada State Bar No. 11479  
4 \*Emma L. Smith  
5 Assistant Federal Public Defender  
6 Illinois State Bar No. 6317192  
7 Jeremy C. Baron  
8 Assistant Federal Public Defender  
9 District of Columbia Bar No. 1021801  
10 411 E. Bonneville Ave. Suite 250  
11 Las Vegas, Nevada 89101  
12 (702) 388-6577  
13 Emma\_Smith@fd.org

14 \*Lead attorney for Petitioner Terry Dixon

15 UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA

17 Terry D. Dixon,

18 Petitioner,

19 v.

20 Renee Baker, et al.,

21 Respondents.

Case No. 3:13-cv-00248-RCJ-WGC

**Order Granting Unopposed motion  
for extension of time in which to  
file second amended petition (ECF  
No. 57)**

**(First request)**

22 Terry Dixon respectfully moves this Court for an extension of time of sixty (60)  
23 days, from February 22, 2021, to and including April 23, 2021, in which to file a  
24 second amended petition.  
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**ARGUMENT**

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2       1.       Following state court proceedings, this Court reopened this case and  
3 allowed Mr. Dixon to file a second amended petition. The second amended petition is  
4 currently due on February 22, 2021.

5       2.       Counsel respectfully suggest additional time remains necessary to  
6 properly prepare the second amended petition. Lead counsel for Mr. Dixon, Emma  
7 Smith, is currently out of the office on maternity leave and is expected to return in  
8 late March. Following her return, counsel will need to consult between themselves  
9 and with Mr. Dixon about the contents of the second amended petition. An extension  
10 is therefore necessary to give counsel, including Ms. Smith, adequate time to prepare  
11 and file the second amended petition.

12       3.       Undersigned counsel has had many additional professional obligations  
13 in the past couple months and has many additional professional obligations in the  
14 next two months. However, because undersigned counsel's caseload is not  
15 particularly relevant to this extension motion, undersigned counsel isn't providing a  
16 summary of his caseload here.

17       4.       On February 19, 2021, undersigned counsel contacted Senior Deputy  
18 Attorney General Jessica E. Perlick and informed her of this extension request. As a  
19 matter of professional courtesy, Ms. Perlick had no objection to the request. Ms.  
20 Perlick's lack of objection shouldn't be considered a waiver of any procedural defenses  
21 or statute of limitations challenges, or construed as agreeing with the accuracy of the  
22 representations in this motion.

23       5.       In sum, counsel request an additional sixty (60) days, up to and  
24 including April 23, 2021, in which to file the second amended petition. This is  
25 counsel's first request for an extension of time to file the petition. This motion isn't  
26 filed for the purposes of delay, but in the interests of justice, as well as in Mr. Dixon's  
27 interest. Counsel respectfully ask the Court to grant the requested extension.

1 Dated February 22, 2021.

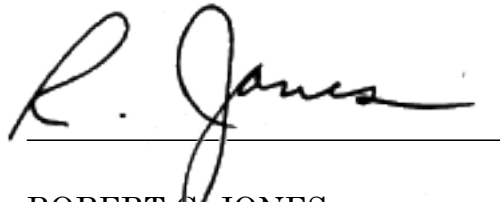
2 Respectfully submitted,

3  
4 Rene L. Valladares  
Federal Public Defender

5  
6 /s/ Jeremy C. Baron

7 Jeremy C. Baron  
Assistant Federal Public Defender

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11 IT IS SO ORDERED:

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15 ROBERT C. JONES  
16 United States District Judge

17 Dated: February 24, 2021.  
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